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10 *Attorneys for Plaintiffs, American Airlines Flow-Thru*
11 *Pilots Coalition, Gregory R. Cordes, Dru Marquardt,*
Doug Poulton, Stephan Robson and Philip Valente III

12
13 **UNITED STATES DISTRICT COURT**
14 **NORTHERN DISTRICT OF CALIFORNIA**

15 AMERICAN AIRLINES FLOW-THRU
16 PILOTS COALITION, GREGORY R.
CORDES, DRU MARQUARDT, DOUG
17 POULTON, STEPHAN ROBSON and
PHILIP VALENTE III, on behalf of
18 themselves and all others similarly situated
Plaintiff,

19 v.

20 ALLIED PILOTS ASSOCIATION and
21 AMERICAN AIRLINES, INC.
Defendants.

Case No.: 3:18-cv-03682-RS

[Assigned to Judge Richard Seeborg]

**STIPULATION AND ORDER TO
STAY PROCEEDINGS**

22
23 Plaintiffs American Airlines Flow-Thru Pilots Coalition, Gregory R. Cordes, Dru
24 Marquardt, Doug Poulton, Stephan Robson and Philip Valente III (collectively, "Plaintiffs") and
25 Defendant Allied Pilots Association ("Defendant") (collectively the "Parties") hereby stipulate,
26 and respectfully request that the Court stay any and all proceedings (except those specifically set
27 forth below) in the above captioned case pending conclusion of trial and any post-trial motions in
28 Stipulation and [Proposed] Order To Stay Proceedings
Case No. 3:18-cv-03682-RS

1 the lawsuit titled *American Airlines Flow-Thru Pilots Coalition, et al. v. Allied Pilots Association,*
2 *et al.*, Civil Action No. 3:15-cv-03125 RS (the “2015 Case”). In support thereof, the Parties show
3 as follows:

4 WHEREAS, this Court granted class certification of the 2015 Case.

5 WHEREAS, trial in the 2015 Case is currently set for April 6, 2020.

6 WHEREAS, the above captioned matter titled *American Airlines Flow-Thru Pilots*
7 *Coalition, et al. v. Allied Pilots Association, et al.*, Civil Action No. (3:18-cv-03682-RS) (the
8 “2018 Case”) is currently pending.

9 WHEREAS, the Parties agree that the Court will likely make certain rulings in the 2015
10 Case that will be applicable and/or provide guidance in the 2018 Case.

11 WHEREAS, the Parties agree that there is no need to further litigate the 2018 Case until
12 the conclusion of trial and any post-trial motions in the 2015 Case.

13 WHEREAS, the Parties agree that the stay will result in taking the following future
14 scheduled events off calendar: (1) the Joint CMC statement scheduled for February 6, 2020; and
15 (2) the CMC scheduled for February 13, 2020.

16 WHEREAS, the Parties agree that a date for the CMC (currently scheduled for February)
17 will be re-determined at a later date at the end of the stay.

18 WHEREAS, the Parties specifically agree that the stay shall extend to any discovery in the
19 2018 Case.

20 WHEREAS, the Parties agree that the stay shall not extend to Defendant’s Motion To
21 Dismiss, which has been fully briefed and is currently pending decision by the Court.

22 WHEREAS, the Parties agree that resolution of Defendant’s Motion to Dismiss shall allow
23 the Parties to have a better understanding of those events that will need to be rescheduled at the
24 end of the stay.

1 Therefore, the parties respectfully request that the Court stay any and all proceedings in the
2 2018 Case (except those specifically set forth above) pending the conclusion of trial and any post-
3 trial motions in the 2015 Case.

4 The foregoing is so stipulated and agreed between the parties by and through their
5 undersigned counsel.

6
7 Dated: January 30, 2020

Respectfully submitted,

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22 By: _____
23 Timothy D. McGonigle

24 Attorneys for Plaintiffs

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Stipulation and [Proposed] Order To Stay Proceedings
Case No. 3:18-cv-03682-RS

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By: _____
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Attorneys for Defendant Allied Pilots Association
*Admitted pro hac vice

Signature Attestation

Pursuant to Local Civil Rule 5-1(i)(3), I attest that concurrence in the filing of this document has been obtained from each of the above signatories.

Dated: January 31, 2020.

TIMOTHY D. MCGONIGLE

By: /s/ Timothy D. McGonigle
Timothy D. McGonigle

1 **ORDER**

2 Based on the foregoing stipulation of counsel, and GOOD CAUSE appearing to do so, the
3 Court hereby makes the following Order:

4 All proceedings in the above captioned matter titled *American Airlines Flow-Thru Pilots*
5 *Coalition, et al. v. Allied Pilots Association, et al.*, Civil Action No. 3:18-cv-03682-RS (the “2018
6 Case”) (except those specifically set forth below) are stayed pending the conclusion of trial and
7 any post-trial motions of the lawsuit titled *American Airlines Flow-Thru Pilots Coalition, et al. v.*
8 *Allied Pilots Association, et al.*, Civil Action No. 3:15-cv-03125 RS (the “2015 Case”).
9

10 The following future scheduled events shall be taken off calendar and re-determined at a
11 later date at the end of the stay: (1) the Joint CMC statement scheduled for February 6, 2020; and
12 (2) the CMC scheduled for February 13, 2020.

13 The stay shall extend to any discovery in the 2018 Case.

14 The stay shall not extend to Defendant’s Motion To Dismiss, which has been fully briefed
15 and is currently pending decision by the Court.
16

17 Dated: 2/3/2020

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20 United States District Court Judge
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